

Sara Autenrieth  
Sara Autenrieth Region  
June 30, 2006

Dear Sir or Madam,

I am writing this letter because I am concerned about the proposed Business Opportunity Rule R511993. I have been involved with Arbonne International for the past year. The selling of Arbonne's products has greatly contributed to my personal finances as well as that to my immediate and extended family. Arbonne has tremendously affected me personally as well. I have gained confidence, communication skills, business experience, and have developed as a person due to my experience with Arbonne.

I believe that in its present form, Business Opportunity Rule R511993, could prevent me from continuing as an Arbonne Independent Consultant. I understand that part of the FTC's responsibility is to protect the public from "unfair and deceptive acts or practices," but some areas of the proposed rule will make it very difficult, if not impossible, for me to sell Arbonne products and sponsor people into the business.

I am opposed to the seven-day waiting period proposed by this bill. I strongly feel that this casts a negative light on the direct selling plan. I also feel that this would create many administrative and record keep problems and chaos as well as unnecessary delays. Not only do Arbonne Starter Kits cost a nominal amount of money, the proposed waiting period gives the impression that there might be something wrong the Arbonne opportunity. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about Arbonne and keep track of when to follow up. One of the key elements to my success in this business has been capturing the enthusiasm and immediate results prospects experience with Arbonne products; the waiting period would potentially limit my ability to grow my business.

The proposed rule also calls for the release of **any** information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent. A lawsuit may incorrectly imply wrongdoing and it seems unfair to disclose lawsuit information unless Arbonne has been found guilty of something. I fear being penalized by the impression a lawsuit would leave, even if I have done nothing wrong. It is unfair that it does not distinguish between winning and losing lawsuits!

One of the most impractical proposals of the rule is the impracticability of finding the 10 nearest consultants to use as references. I am glad to provide references, but identity theft is a reality we live with in today's world and I am very uncomfortable with giving out personal information about individuals, without their permission or knowledge, to strangers. Also, sharing this information could damage the business relationship of references with those involved in other companies or businesses, or provide an unfair advantage to competitors. In order to get the proposed list of 10 prior Independent Consultants, I would need to send the address of a prospect to the Arbonne corporate office in California and then wait for the list. The proposed rule also includes the language, "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers" and prospects

will be understandably concerned about their privacy. I would find it an invasion of privacy to disclose personal data, for my business purposes.

This July will be my one year anniversary as an Arbonne Independent Consultant. I became a Consultant because I love the products and our family was in need of a second source of potential income. Since starting my Arbonne business, I have developed a team of nearly 400 Independent Consultants across the country and together we are helping our families enjoy better lives.

I truly appreciate the work of the FTC in protecting consumers, but I believe this proposed new rule would have many detrimental (and unintentional) consequences and I hope there are alternative means to resolving the outstanding issues at hand, without harming the livelihood of millions of successful network marketers, like me.

Thank you for your time and understanding.

Sincerely,

Sara Autenrieth